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March 28, 2017

VIA ECF

The Honorable Katherine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1950
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,*
Case No. 15-CV-5345 (AJN)**

Dear Judge Parker:

We represent Triadou SPV S.A. (“Triadou”) in the above-captioned matter. We write on behalf of all parties to the above-referenced action to jointly request an extension of the fact discovery deadline, which is set forth in the Court’s Order dated July 29, 2016 (ECF No. 205), from April 3, 2017 to July 14, 2017. The parties also jointly request that the remaining deadlines set forth in the Court’s July 29 Scheduling Order be adjusted accordingly. Although the parties have worked diligently to complete discovery, they do not expect to be able to do so before April 3, 2017. This is the parties’ first request to extend the deadline for completing fact discovery.

Although the parties have not been able to complete fact discovery, they have made significant progress. By the current close of fact discovery, the parties will have produced a substantial number of documents in response to requests that have been issued. The parties also have noticed many depositions and served sixteen subpoenas. The parties continue to work cooperatively and with third parties to schedule further depositions as expeditiously as possible, including several depositions that are expected to occur overseas. The only deposition that has occurred to date is that of Triadou’s corporate representative, Cesare Cerrito.

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Based on the current state of discovery, the parties propose amending the existing schedule as follows:¹

Event	Current Deadline	Revised Deadline
Serve Requests to Admit	March 6, 2017	June 14, 2017
Fact Discovery Close	April 3, 2017	July 14, 2017
Expert Discovery Close	May 31, 2017	September 8, 2017

If this proposed schedule meets with the Court's approval, the parties respectfully request that the Court enter an amended scheduling order on the docket reflecting these updated deadlines.

Very truly yours,

s/ Deborah A. Skakel
 Deborah A. Skakel

cc: All Counsel of Record (*via* ECF)

¹ The parties believe that a three-month extension of the fact discovery deadline is sufficient at this time, but there is some uncertainty concerning the amount of time needed to complete certain foreign discovery. The parties will ask for further relief if appropriate.